

Gareth De Santiago, Esquire. LLC
Attorney & Counselor at Law
211 Graphic Boulevard
New Milford, NJ 07646
fax 201.261.5524
973.689.5638
GarethDSK@yahoo.com
Member NJ & NY Bars
Member Federal Bar Association
12.2.2013

By Fed Ex
Atten: Clerk Staff - Ms. Jane
Court Clerk – Civil Division
MLK, Jr. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Jemas v. CitiMortgage, et al
Civil Action No. 12-cv-03807
For Immediate Filing On Pacer Plaintiff's Second Amended Complaint

Dear Sir / Madam:

Enclosed herewith for immediate filing please find copy of plaintiff's Second Amended Complaint to be substituted as Plaintiff's complaint in opposition to the motion of defendant's to dismiss plaintiff's complaint.

We have waited over 12 months for discovery from the defendants and over 4 written requests and even a conference with a Magistrate Judge on or about 11.20.2013 on the missing discovery issue, and we still have not received one shred of written discovery from this defendant.

To save space all the exhibits of plaintiff's appeal and plaintiff's motion for declaratory judgment are incorporated in the plaintiff's second amended complaint in their entirety.

This amended complaint was drafted because we had no alternative but to seek information on our own which is incomplete for certain, but we had no choice. We categorically reserve the right to amend this complaint when and if ever the defense supplies the plaintiff's with discovery and request that any motion they may be seeking to dismiss be absolutely held in abeyance pending receipt of discovery from them and our liberal opportunity to review and seek supplementation as necessary.

Thank you for your kindness and consideration in this matter. Please do not hesitate to contact me if you have any questions regarding this matter.

Respectfully,



A handwritten signature in black ink, appearing to read 'Gareth De Santiago', with a stylized, flowing script.

Gareth De Santiago, Esquire, LLC
Enclosures